

EPA's CSM Outline Direction – Dec. 8, 2011 Letter to LWG Requested Sections/Content		Where Found in the Draft RI or To Be Found in the Draft Final RI	Notes on Section Content and Proposed Approach to Addressing EPA Requests for Specific Information in Section 10.2 in the Draft Final RI
		<b>Section 10.2 Chemical-Specific Conceptual Site Models</b>	This section was not requested in the EPA outline but will be maintained. It provides an overview of the format/content of the chemical-specific CSM sections and details how the data products were compiled and what they show.
		<b>Section 10.2.X (where X is a specific chemical)</b>	This section was not requested in the EPA outline but will be maintained. It summarizes each chemical's environmental chemistry, site use, and the findings of the baseline risk assessments.
<b>Section 1</b>	<b>Chemical Distribution</b> – describe chemical distribution for the media listed below: a) Sediment; b) Surface Water; c) TZW; and d) Biota.	<b>Section 10.2.X.1 (where X is the specific chemical subsection)</b>	This section of the Draft RI discusses distribution of each chemical in site media, but is heavily focused on the distribution in sediments in the Draft RI. Summary subsections on the distribution of each CSM Indicator Chemical (IC) in surface water, TZW, and biota will be added to this section in the Draft Final RI in response to this EPA comment.
<b>Section 2</b>	<b>Potential Sources</b> – discuss potential sources both from a broad usage perspective and a pathway-specific basis.	<b>Section 10.2.X.2</b> Section 3 and 4 (as detailed below) Table 4.2-2 (sources table) Section 10 panels and Section 10 loading, F&T figures	Sections 10.2.X.2 and 10.2.X.3 of the Draft RI discuss sources and pathways, both broadly and specifically, and include tables of IC sources; the oversized panel maps, which present the mapped distribution for all media sampled; and loading, fate, and transport summaries/figures for source terms and all ICs. The summarized information is derived from Section 4, 5, and 6 text and tables. In response to EPA comments, additional information will be added to these subsections summarizing the new historical activities shown on Section 10 Panels (which will be extracted from the NEW Section 3 historical industry maps).
	<p><b>a. Usage of Chemical – Historical and Current:</b></p> <p>Describe what is known about the use of the chemical on an industry sector basis.</p> <p>Describe the types of industries that existed in Portland Harbor that are known to have handled, manufactured or disposed of the chemical</p>	<p>Section 10.2.X.2 New Section 3.2.1 (Historical and Current Land Use)</p> <p>Section 10.2.X.2 New Section 3.2.1</p>	<p>This is summarized under 10.2.X.2 and additional information will be added based on the NEW Section 3.2.1 text, maps, and tables.</p> <p>This is summarized under 10.2.X.2 and additional information will be added based on the NEW Section 3.2.1 text, maps, and tables.</p>
	<p><b>b. Stormwater/Overland Transport:</b></p> <p>Describe those facilities, stormwater basins or land use types where the chemical is known to be present in stormwater at significant levels.</p> <p>Cite factual information such as chemical concentrations, stormwater loading data and/or priority of source based on DEQ source control information.</p>	<p>Section 10.2.X.3 Sections 4.4.1 and 4.4.2 Table 4.2-2 (source table) Table 4.4-4 (outfall table) Maps 4.6-1c and 4.6-1e (DEQ SCE status &amp; ranking)</p>	Section 10.2.X.3 includes a summary of the significance of stormwater loading for CSM ICs for across various land use types and relative to other loading terms. This summary is derived from the empirical loading calculations presented in RI Section 6. Table 4.2-2 (source table) and Table 4.4-4 (Shared Conveyance System Basin Characteristics and Potential Sources) and Map 4.6-1 (DEQ SCE status & ranking) are referenced to provide site-specific information. Chemical concentrations and stormwater loading data are found in Sections 4 and 6. The Draft Final RI will summarize this body of information and cite the more detailed RI sections to support the discussion.

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	<p><b>c. Wastewater:</b></p> <p>Describe those facilities where the chemical is known to be associated with wastewater discharges.</p> <p><b>Cite factual information to the extent possible to support the association of the chemical with the wastewater discharge (e.g., permit violations, documented spills or other documented information from DEQ files).</b></p>	<p>Section 10.2.X.2 Sections 4.3 and 4.4 Tables 4.4-6 and 4.4-7</p>	<p>Facilities with wastewater permits are identified in Table 4.4-6. Chemicals that are monitored under their wastewater permits are listed in Table 4.4-7. This information will be summarized in the Draft Final RI Section 10.2.X.2.</p> <p>DEQ does not maintain a centralized database of permit violations. Wastewater permit violations are discussed in the Site Summaries, but this information is not compiled in the Draft RI and is not planned for Draft Final RI. As discussed with EPA, a directive to gather and cite information “to the extent possible” is unduly burdensome for the LWG and may produce little information of use to the RI. Assembling this information would be a significant effort, and the information would not be inclusive of all entities that have wastewater permits and, therefore, would be uneven and inconsistent between areas. To the extent DEQ and EPA identify information in their source control and 104(e) information gathering and review processes that must be inserted into the RI, we would ask that DEQ and EPA supply it by February 18, 2011.</p>
	<p><b>d. Overwater Discharge:</b></p> <p>Cite factual information to the extent possible to support the association of the chemical with the overwater discharges (e.g., documented spills).</p>	<p>Section 10.2.X.2 Section 4.4.6 Tables 4.3-1 and 4.3-3 (overwater spills) Map 4.6-1d (DEQ SCE status &amp; ranking)</p>	<p>Information on overwater discharge is derived from Section 4 text and tables, and Map 4.6-1d (DEQ SCE status &amp; ranking) and is summarized in Section 10.2.X.2. As part of the Draft RI revision process, the National Response Center database maintained by the USCG was recently (January 2011) reviewed for new spills that have occurred in Portland Harbor since the Draft RI and this new spill information will be added to Tables 4.3-1 and 4.3-3 and discussed in the Draft Final RI Section 10 as warranted.</p> <p>As noted, the directive “to the extent possible” is unduly burdensome and may produce little information of use. The LWG will nonetheless check its available information sources to determine if any significant discharges have not yet been captured in Section 4. If EPA/DEQ has additional overwater discharge data/information that they have gathered in their source control and 104(e) processes and can provide to the LWG by February 18, 2011, this information will be incorporated into the Draft Final RI.</p>
	<p><b>e. Groundwater Discharge:</b></p> <p>Describe sites where groundwater plumes associated with the chemical are present. <b>Present factual information such as chemical concentration in near shore groundwater wells and DEQ ranking of priority.</b></p>	<p>Sections 10.2.X.2 and 10.2.X.3 Section 4.4.3 Maps 4.4-3a-h Map 4.6-1b (DEQ SCE status &amp; ranking)</p>	<p>The information summarized in Section 10.2 is derived from Section 4 text and tables, Section 4.4.3 (upland groundwater plumes), and Map 4.6-1b (DEQ SCE status &amp; ranking). In addition, in response to EPA specific comments on Draft RI Section 5.4, TZW plume maps from Appendix C2 are being added to Section 4, and the TZW data set will be screened in Section 5 (presented in a new RI Section 5 appendix). The TZW screening results will be compared with the plume map and any noteworthy observations will be added to Section 10.2.X.2 of the Draft Final RI.</p> <p>The LWG does not believe that the very large effort needed to compile and present chemical concentrations in near shore groundwater wells in the RI is warranted. DEQ is</p>

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			responsible under the source control program to identify areas/sites where the groundwater pathway may be affecting the river. The LWG worked closely with EPA/DEQ to identify and then evaluate nine priority sites where there was reason to believe this pathway was a concern. This comprehensive groundwater pathway assessment is fully documented in the Draft RI and we do not see the value in compiling the data from the hundreds of groundwater wells along the river in the Study Area.
	<b>f. Riverbank Erosion:</b>  Describe sites where the chemical has been detected in riverbank soils.	Section 10.2.X.2 and Section 10 Panels Section 4.4.4 Map 4.6-1a (DEQ SCE status & ranking)	Information on bank erosion is derived from Section 4 text and tables, and Map 4.6-1a (DEQ SCE status & ranking). The Section 10 panels map riparian soil from the limited sites where it was available. This information will be reviewed and additional language will be added to the Section 10 text if warranted.
	<b>g. Atmospheric Deposition:</b>  Describe what is known about atmospheric deposition. Cite data to the extent available	Sections 10.2.X.2 and 10.2.X.3 Section 4.4.5 Section 6 (loading)	Information on atmospheric loading is compiled/evaluated in Section 6 (and Appendix E) and the estimates for each IC are summarized in Section 10.2.X.3 and Section 10 figures. This information will be reviewed as a part of the revision of Section 10.
	<b>h. Upriver (Watershed) Sources:</b>  Describe what is known about upriver (watershed) sources.  Cite data including data from the downtown reach, upriver reach, and other data generated by DEQ, USGS and others.	Sections 10.2.X.2 and 10.2.X.3 Section 4.5 Table 4.5-1 (upriver ECSI sites and associated COIs) Map 4.5-1a-d (upriver ECSI sites) New RI Addendum including updated database and downtown reach data Section 5.6	Section 10.2.X.3 addresses upriver sources/inputs as part of the loading term estimate summaries; the calculations are presented in Section 6. Section 4 has a subsection on upriver sources, and this will be expanded to include information on sources from the City's reports on the Downtown Reach. Information on sources between the Downtown Reach and the falls will come from the ECSI database summaries currently presented in Section 4. Information on reaches above the falls will be in the general description of watershed activities, also currently presented in Section 4. The NEW RI Addendum will present the updated upstream data, including the much larger downtown reach data sets, which are being added to the project database in accordance with the data lockdown update.

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<b>Section 3</b>	<p><b>Relationship of Sources to Distribution of Chemical:</b> Describe how the source information (including upriver/watershed sources) accounts for the distribution of contamination at the site.</p> <p>Focus on sediment distribution but also describe surface water, biota and transition zone water data. Discuss sources from the perspective of current and historical sources.</p> <p><b>Describe status of DEQ source control efforts (including watershed wide and downtown reach) to control current sources.</b></p>	<p><b>Section 10.2.X.4 Chemical X CSM Summary</b> Section 10 panels All RI sections noted above</p>	<p>The major elements of the Draft RI Section 10.2.X.4 (CSM summaries for each CSM IC) are listed below. With the exception of the DEQ source control status, this subsection addresses the major elements of EPA's outline. These Section 10.2.X.4 narratives will be revised in the Draft Final RI per the new or updated information sources noted above (e.g., historical industry maps).</p> <ul style="list-style-type: none"><li>-Status of use and manufacturing (historical /current)</li><li>-General distribution and known upland sources</li><li>-Relationship between surface and subsurface concentrations, other media, and source proximity</li><li>-External and stormwater inputs, mass flux</li><li>-Summary of human health and eco risk</li><li>-Future fate of chemical in in-water media</li></ul> <p>Currently, discussion of DEQ source control efforts in the RI is limited to a general description of the DEQ JSCS program and summaries of the most current DEQ Milestone Table, presented at the end of Section 4. Source control at specific sites (beyond the Milestone Report table) or of specific chemicals are not addressed in the RI.</p>